

PATENT  
450101-02352**REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

**I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1-52 are currently pending. Claims 53-92 were previously withdrawn without prejudice or disclaimer of subject matter. Claims 1 and 27 are independent and are hereby amended. No new matter has been introduced. Support for this amendment is provided throughout the Specification as originally filed.

Changes to the claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

**II. REJECTIONS UNDER 35 U.S.C. §102**

Claims 1, 2, 9, 27, 28 and 35 were rejected under 35 U.S.C. §102(e) as allegedly anticipated by U.S. Patent No. 5,598,216 to Lee (hereinafter, merely "the '216 patent"). Applicant respectfully traverses this rejection.

Independent claim 1 recites, *inter alia*:

parsing said video/audio signals and extracting therefrom motion vectors of said video/audio signals, DCT-coefficients and macroblock-type;

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using said extracted motion vectors, DCT-coefficients and macroblock-type to extract at least one compressed domain feature point representing characteristics of said video/audio signals in a compressed domain of said video/audio signals;

As understood by the Applicants, Lee '216 discloses a video signal encoding apparatus that determines quasi-feature points on the current frame based on selected feature points on the previous frame. A predicted current frame is obtained based on a number of regions formed by the quasi-feature points. The feature points are determined by a grid technique employing various types of grids. Col. 4, line 62 to col. 5, line 5 and FIGS. 4A-4B, 5A-5B.

In contrast, claim 1 recites, "parsing said video/audio signals and extracting therefrom motion vectors of said video/audio signals, DCT-coefficients and macroblock-type" and then "using said extracted motion vectors, DCT-coefficients and macroblock-type to extract at least one compressed domain feature point representing characteristics of said video/audio signals in a compressed domain of said video/audio signals." Motion estimation of the extracted feature points is determined and the feature points associated with a motion vector are tracked through a pre-set number of frames of the video/audio signals.

The parsing unit 61 is responsible for MPEG bitstream parsing, as well as DCT-coefficient and motion vector extraction. The parsing unit 61 supplies the type of the current macroblock (Intra, Bidirectional prediction or Prediction), the extracted MPEG motion vectors and the DCT-coefficients for the current frame to the feature point selection unit (and also to the motion estimation unit 62). Page 19, line 20 to page 20, line 4 and in FIGS. 6 and 7.

Thus, in the present invention, extraction of a particular feature point is determined from the motion vectors, DCT-coefficients and macroblock-type. This selection of feature points is

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not disclosed in Lee '216. Indeed, Lee is distinguishable from the present invention by, at least, in the method by which feature points are selected.

Claim 1 is not anticipated by Lee '216 because that reference does not disclose each and every limitation recited in the claim. In particular, Lee '216 does not disclose, "using said extracted motion vectors, DCT-coefficients and macroblock-type to extract at least one compressed domain feature point representing characteristics of said video/audio signals in a compressed domain of said video/audio signals" as recited in claim 1.

For reasons similar or somewhat similar to those described above with regard to independent claim 1, independent claim 27 is also believed to be patentable.

## II. REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 3-8, 10-26, 29-34 and 36-52 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Lee '216 and Examiner's Official Notice, as necessary. Applicant respectfully traverses this rejection.

The rejected claims all are dependent from one of either independent claim 1 or 27. The independent claims are patentable over Lee '216 for the reasons stated herein above. Thus, the rejected claims also are patentable by virtue of their dependency at the least. Applicant does not need to take any position of the Examiner's Official Notice at this time.

## III. DEPENDENT CLAIMS

As stated above, the dependent claims depend from one of the claims discussed above and are therefore believed patentable for at least the same reasons. Because each dependent

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claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

**CONCLUSION**

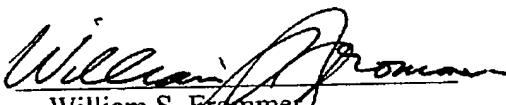
Claims 1-52 are in condition for allowance. In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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